

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

**TRANSDERMAL SPECIALTIES
GLOBAL, INC.,**

Debtor.

CHAPTER 11

Case No. 21-11425 (MDC)

In re:

TRANSDERMAL SPECIALTIES, INC.,

Debtor.

CHAPTER 11

Case No. 21-11428 (MDC)

In re:

BKR IP HOLDCO, LLC

Debtor.

CHAPTER 11

Case No. 21-11429 (MDC)

DEBTORS' MOTION FOR AN ORDER AUTHORIZING JOINT ADMINISTRATION

Transdermal Specialties Global, Inc., (“TS Global”), Transdermal Specialties, Inc. (“TSI”), and BKR IP Holdco, LLC (“BKR”) (TS Global, TSI and BKR shall collectively be referred to herein as “Debtors”) by and through proposed counsel, Ciardi Ciardi & Astin, hereby present the Debtors’ Motion for an Order Authorizing Joint Administration (the “Motion”) and in support thereof respectfully represent:

BACKGROUND

1. On May 19, 2021 (the “Petition Date”) the Debtors filed separate, Voluntary Petitions for relief under Chapter 11 of Title 11 of the United States Code, as amended (the “Bankruptcy Code”).

2. The above captioned cases have been assigned to the same United States

Bankruptcy Judge of the Eastern District of Pennsylvania.

3. The Debtors have continued in possession of their assets and property as Debtors-in-Possession.

4. The Transdermal Specialties Global, Inc., ("TSI Global"), Transdermal Specialties, Inc. ("TSI"), and BKR IP Holdco, LLC ("BKR") (TSI Global, TSI and BKR shall collectively be referred to herein as "Debtors") are three (3) separate companies that revolve around intellectual property owned by BKR. Bruce K Redding is the owner of all three (3) companies and has filed his own Chapter 11 bankruptcy. TSI and TSI Global have licensing agreements with BKR for the use of certain intellectual property.

5. The Debtors have similar ownership structures, some similar unsecured creditors, some similar secured creditors and cross-collateralization issues between the three Debtors.

RELIEF REQUESTED

6. Federal Rule of Bankruptcy Procedure 1015(b)(4) provides that "[i]f a joint petition or two or more petitions are pending in the same court by ... (4) a debtor and an affiliate, the court may order a joint administration of the estates." Fed. R. Bankr. P. 1015(b)(4).

7. The Debtors submit the joint administration of their bankruptcy cases places each debtor in a better position to reorganize its financial affairs, file and confirm their respective, feasible Plans of Reorganization and provide a distribution to unsecured creditors of the Debtors' estates.

8. By and through this Motion, the Debtors seek to maintain separate records and tax identities but desire a lead docket number with respect to the above captioned proceeding and the ability to file a Joint Plan of Reorganization should they so choose. The Debtors submit

that an order authorizing the Joint Administration of the three (3) bankruptcy cases will enhance the judicial economy and save the Debtors and their respective estates time and money.

9. The Debtors submit that the Joint Administration of these cases should be maintained under the case number assigned to **Transdermal Specialties Global, Inc., Bankruptcy Case Number 21-11425**.

10. No previous request for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Debtors hereby respectfully request that this Court enter an Order, substantially in the form attached hereto, authorizing Joint Administration of the Debtors' bankruptcy cases pursuant to Bankruptcy Rule 1015(a).

CIARDI CIARDI & ASTIN

/s/ Daniel S. Siedman

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